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December 17, 2019

VIA HAND DELIVERY

Honorable Richard M. Berman, U.S.D.J.
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. Türkiye Halk Bankasi A.Ş., a/k/a/ “Halkbank”
U.S. District Court for the Southern District of New York
No. 1:15-cr-00867-RMB**

Dear Judge Berman:

We submit this letter, along with the attached appendices, to request this Court stay further proceedings on behalf of Türkiye Halk Bankasi A.Ş. (“Halkbank” or the “Bank”). On December 17, 2019, the Bank filed a petition for mandamus to the Second Circuit, seeking an order directing this Court to allow Halkbank to enter a special appearance. The petition is attached to this letter as Attachment B. The Bank respectfully requests that this Court stay all proceedings, including the show cause briefing, hearing, and the subsequent arraignment, pending a decision by the Second Circuit on the Bank’s mandamus petition. As set forth in the attached Memorandum of Law (Attachment A), a stay is required to protect the Bank from irreparable harm while the petition is pending.

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For the foregoing reasons and the reasons set forth in Halkbank's Memorandum of Law, this Court should grant Halkbank's request to stay proceedings pending the Second Circuit's ruling on the Bank's mandamus petition.

Respectfully,



Andrew C. Hruska

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